

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Genna VanderWeele,

Plaintiff,

v.

**Apple, Inc., and Frank Hill, personally
and individually,**

Defendants.

Case No. 1:23-cv-01075-JMB-RSK

Hon. Jane M. Beckering
Hon. Mag. Ray S. Kent

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JOINT MOTION TO EXTEND ALL CASE MANAGEMENT DEADLINES

The Parties, Plaintiff Genna VanderWeele (“Plaintiff”), and Defendants Frank Hill (“Hill”) and Apple Inc. (“Apple”) (jointly “Defendants”), hereby jointly move this Court for a 90-day extension of all deadlines set forth in the Court’s Case Management Order of February 21, 2024 (ECF No. 26). The Parties have been diligently working toward completion of written discovery,

having served and responded to interrogatories and requests for production, issued third-party subpoenas, and having agreed to a date for completion of Plaintiff's deposition. However, due to challenges when working with this production of electronically stored information ("ESI"), including the identification, location, review, and production of relevant and responsive ESI, Apple's production of all responsive and relevant documents and ESI is still in progress and is not complete.

Counsel and parties have held "meet and confer" conferences on multiple occasions, including on October 1, 2024, when all counsel concurred that extending the current case deadlines by an additional 90 days will allow the Parties to proceed with document production and completion of depositions in an orderly and efficient fashion, which will serve the best interests of justice. For the foregoing reasons, the Parties respectfully request the Court grant an extension of all case management deadlines by 90 days as follows:

Deadline:	Current Date:	Proposed New Date:
Completion of Discovery	October 28, 2024	January 26, 2025
Dispositive Motions	December 13, 2024	March 13, 2025
ADR to Take Place on or Before	November 15, 2024	February 13, 2025

This is the first request for an extension of case management deadlines, the Court has previously granted zero (0) extensions and the Parties do not make this request for purposes of delay.

Respectfully submitted,

/s/ Katherine Smith Kennedy (via email consent)

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Dated: October 4, 2024

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Dated: October 7, 2024

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Dated: October 4, 2024